



Permit / Application Information Sheet **Division of Environmental Protection** **West Virginia Office of Air Quality**

Company:	Kingsford Manufacturing Company		Facility:	Beryl
Region:	7	Plant ID:	057-00003	Application #: 13-2117E
Engineer:	Kessler, Joe		Category:	Charcoal
Physical Address:	Route 46 Beryl WV 26726		SIC: [2861] CHEMICALS AND ALLIED PRODUCTS - GUM AND WOOD CHEMICALS NAICS: [325191] Gum and Wood Chemical Manufacturing	
County:	Mineral			
Other Parties:	MANAGER - Stephenson, Scott 304-478-5529			

Information Needed for Database and AIRS
 1. Need valid physical West Virginia address with zip

Regulated Pollutants		
CO	Carbon Monoxide	32.940 TPY
PM10	Particulate Matter < 10 um	111.860 TPY
SO2	Sulfur Dioxide	48.000 TPY
VOC	Volatile Organic Compounds (Reactive organic gases)	9.260 TPY
PM2.5	Particulate Matter < 2.5 um	80.750 TPY
PT	Total Particulate Matter	167.630 TPY
VHAP	VOLATILE ORGANIC HAZARDOUS AIR POLLUTANT	0.240 TPY
NOX	Nitrogen Oxides (including NO, NO2, NO3, N2O3, N2O4, and N2O5)	208.000 TPY

Summary from this Permit 13-2117E

Air Programs		Applicable Regulations
TITLE V		
Title V/Major		
Fee Program	Fee	Application Type
7H	\$1,000.00	MODIFICATION

Activity Dates

APPLICATION RECEIVED	06/24/2016
APPLICANT PUBLISHED LEGAL AD	06/25/2016
ASSIGNED DATE	06/27/2016
APPLICATION FEE PAID	06/27/2016 credit card
APPLICATION DEEMED COMPLETE	07/21/2016

Notes from Database

Permit Note: Modification to increase the char production limits to 5.0 tons per hour (TPH) and 32,000 tons per year (TPY). PSD Applicability Analysis included.

NOTICE

NON-CONFIDENTIAL

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 057-00003
 Company: Kingsford Manufacturing Company
 Printed: 09/19/2016
 Engineer: Kessler, Joe

IPR FILE INDEX

Applicant : Kingsford Manufacturing Company **Plant ID No.:** 057-00003
Facility : Beryl Plant **Permit No.:** R13-2117E

Chronological Order - Add Index Pages As Necessary

[illegible]

JRK
9/27/16

AIR QUALITY PERMIT NOTICE

Notice of Intent to Approve

On June 24, 2016, Kingsford Manufacturing Company applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to modify the Beryl wood char production plant located near Piedmont, Mineral County, WV at latitude 39.47729 and longitude -79.06650. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed modification. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R13-2117E.

The following changes in potential emissions will be authorized by this permit action: Particulate Matter less than 2.5 microns, 15.22 tons per year (TPY); Particulate Matter less than 10 microns, 13.12 TPY; Particulate Matter, 0.78 TPY; Sulfur Dioxide, 6.00 TPY; Oxides of Nitrogen, 25.84TPY; Carbon Monoxide, 3.92 TPY; Volatile Organic Compounds, 1.16TPY; Hazardous Air Pollutants, -4.26 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on XXXXXX. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Joe Kessler, PE
WV Department of Environmental Protection
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Telephone: 304/926-0499, ext. 1219
FAX: 304/926-0478

Entire Document
NON-CONFIDENTIAL

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx

Kessler, Joseph R

From: Adkins, Sandra K
Sent: Wednesday, September 28, 2016 9:26 AM
To: Gillenwater, Kelley J; Glance, Jacob P
Cc: Kessler, Joseph R
Subject: DAQ Public Notice

Please see below the Public Notice for Draft Permit R13-2117E for Kingsford Manufacturing Company's Beryl Plant located in Mineral County.

The notice will be published in the *Mineral Daily News Tribune* on Friday, September 30, 2016, and the thirty day public comment period will end on Monday, October 31, 2016.

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Kessler, Joseph R

From: Adkins, Sandra K
Sent: Wednesday, September 28, 2016 9:26 AM
To: 'wentworth.paul@epa.gov'; 'bradley.megan@epa.gov'; scott.stephenson@clorox.com
Cc: Durham, William F; McKeone, Beverly D; McCumbers, Carrie; Hammonds, Stephanie E; Kessler, Joseph R; Rice, Jennifer L; Taylor, Danielle R; Kreger, Joseph A; Tephabock, Brian S; Scanlan, Christopher P
Subject: WV Draft Permit R13-2117E for Kingsford Manufacturing Company; Beryl Plant
Attachments: 2117E.PDF; Eval2117E.PDF; notice.pdf

Please find attached the Draft Permit R13-2117E, Engineering Evaluation, and Public Notice for Kingsford Manufacturing Company's Beryl Plant located in Mineral County.

The notice will be published in the *Mineral Daily News Tribune* on Friday, September 30, 2016, and the thirty day comment period will end on Monday, October 31, 2016.

Should you have any questions or comments, please contact the permit writer, Joe Kessler, at 304 926-0499 x1219.

Kessler, Joseph R

From: Adkins, Sandra K
Sent: Wednesday, September 28, 2016 9:22 AM
To: Weaver, Mary Lou
Cc: Kessler, Joseph R
Subject: RE: Publication of Class I Legal Ad for the WV Division of Air Quality

Mary Lou,

Yes, that will be ok. Please publish the ad as it appears – we will not need to make any changes to publish in the Friday, September 30 edition. Thank you.

Sandra

From: Weaver, Mary Lou [mailto:mweaver@newstribune.info]
Sent: Wednesday, September 28, 2016 9:15 AM
To: Adkins, Sandra K <Sandra.K.Adkins@wv.gov>
Subject: Re: Publication of Class I Legal Ad for the WV Division of Air Quality

Sandra:

I received your email, but we are past the deadline for tomorrow's publication, but we can have it run on Friday, September 30. Would that be acceptable?

Please let me know.

Thanks,

Mary Lou

On Tue, Sep 27, 2016 at 11:37 AM, Adkins, Sandra K <Sandra.K.Adkins@wv.gov> wrote:

Please publish the information below as a Class I legal advertisement (one time only) in the Thursday, September 29, 2016, issue of the *Mineral Daily News Tribune*. Please let me know that this has been received and will be published as requested. Thank you.

Send the invoice for payment and affidavit of publication to:

Sandra Adkins

WV Department of Environmental Protection

DIVISION OF AIR QUALITY

601- 57th Street

Charleston, WV 25304

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Charleston, WV 25304

Telephone: [304/926-0499, ext. 1219](tel:3049260499)

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This message may contain confidential and/or privileged information. If you are not the intended recipient or authorized to receive this for the intended recipient, you must not use, copy, disclose or take any action based on this message or any information herein. If you have received this message in error, please advise the sender immediately by sending a reply e-mail and delete this message. Thank you for your cooperation.

Kessler, Joseph R

From: Adkins, Sandra K
Sent: Tuesday, September 27, 2016 11:37 AM
To: classified@newstribune.info
Cc: Kessler, Joseph R
Subject: Publication of Class I Legal Ad for the WV Division of Air Quality

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Sandra Adkins

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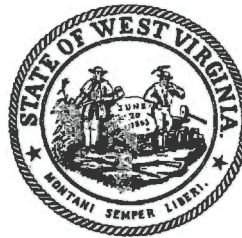
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Permit to Modify

Entire Document
NON-CONFIDENTIAL



R13-2117E

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Kingsford Manufacturing Company
Beryl Plant
057-00003

DRAFT

William F. Durham
Director

Issued: **DRAFT**

This permit supercedes and replaces R13-2117D issued on December 12, 2002.

Facility Location: West of Luke, Maryland, in Mineral County, West Virginia
Mailing Address: P.O. Box 6
Beryl, WV 21540-0006
Facility Description: Char Manufacturing Facility
SIC/NAICS Code: 2861/325191
UTM Coordinates: 666.00 km Easting • 4,371.00 km Northing • Zone 17
Latitude/Longitude: 39.47729/-79.06650
Permit Type: Modification
Description: Modification to increase the char production limits to 5.0 tons per hour (TPH) and 32,000 tons per year (TPY).

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement date of any operation authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

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1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed/Modified	Design Capacity	Control Device
003-01	S-02	Rotary Wood Dryer	1998	40 TPH	ACC (C-8)
03-002	S-02	Multi-Hearth Retort Furnace	1962/1997	5 TPH Char 20 TPH Wet Wood	ACC (C-8)

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NSPS	New Source Performance
CBI	Confidential Business Information	PM	Standards
CEM	Continuous Emission Monitor	PM_{2.5}	Particulate Matter
CES	Certified Emission Statement		Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million		Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	UTM	
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VEE	Visual Emissions Evaluation
NA	Not Applicable	VOC	Volatile Organic Compounds
NAAQS	National Ambient Air Quality Standards	VOL	Volatile Organic Liquids
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		
NO_x	Nitrogen Oxides		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation.*

2.4. Term and Renewal

- 2.4.1. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2117 through R13-2117E and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. This permit supercedes and replaces R13-2117D. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

- 3.2.1. **Emission Limit Averaging Time.** Unless otherwise specified, compliance with all annual limits shall be based on a rolling twelve month total. A rolling twelve month total shall be the sum of the measured parameter of the previous twelve calendar months. Compliance with all hourly emission limits shall be based on the applicable NAAQS averaging times or, where applicable, as given in any approved performance test method.

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the

permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
 - b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
 - c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
 - d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.
- [WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

- 3.5.4. **Operating Fee.** In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a Certified Emissions Statement (CES) and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. The Rotary Wood Dryer, identified as E-03-01, shall be operated according to the following requirements:
- At all times the dryer is in operation, the exhaust gases from the unit shall be routed to and combusted by the After Combustion Chamber (ACC) prior to their release to the atmosphere; and
 - The maximum throughput of wet wood processed by the dryer shall not exceed 36 TPH or 192,000 TPY.
- 4.1.2. The Multi-hearth Retort Furnace, identified as E-03-02, shall be operated according to the following requirements:
- At all times the furnace is in operation, the exhaust gases from the unit shall be routed to and combusted by the ACC prior to their release to the atmosphere; and
 - The maximum throughput of dry wood processed by the furnace shall not exceed 18 TPH or 96,000 TPY.
- 4.1.3. The maximum production of wood char at the facility shall not exceed 5.0 TPH or 32,000 TPY.
- 4.1.4. Emissions to the atmosphere from the ACC, identified as C-8, shall be limited to the following:

Table 4.1.4: After Combustion Chamber Emission Limits

Pollutant	lb/ton-char	PPH	TPY
CO	2.06	10.30	32.94
NO _x	13.00	65.00	208.00
PM _{2.5} ⁽¹⁾	5.00	25.00	80.00
PM ₁₀ ⁽¹⁾	6.78	33.90	108.46
PM ⁽¹⁾	10.00	50.00	160.00
SO ₂	3.00	15.00	48.00
VOC	0.58	2.90	9.26

(1) Includes condensables.

4.1.5. **45CSR7**

The Rotary Wood Dryer and Multi-hearth Retort Furnace shall each comply with all applicable limitations and standards under 45CSR7, including the requirements given below under (a) through (e).

- No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsections 3.2, 3.3, 3.4, 3.5, 3.6, and 3.7.

[45CSR§7-3.1]

- b. The provisions of subsection 3.1 shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.
[45CSR§7-3.2]
- c. No person shall cause, suffer, allow or permit particulate matter to be vented into the open air from any type source operation or duplicate source operation, or from all air pollution control equipment installed on any type source operation or duplicate source operation in excess of the quantity specified under the appropriate source operation type in Table 45-7A found at the end of this rule.
[45CSR§7-4.1]
- d. No person shall cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.
[45CSR§7-5.1]
- e. The owner or operator of a plant shall maintain particulate matter control of the plant premises, and plant owned, leased or controlled access roads, by paving, application of asphalt, chemical dust suppressants or other suitable dust control measures. Good operating practices shall be implemented and when necessary particulate matter suppressants shall be applied in relation to stockpiling and general material handling to minimize particulate matter generation and atmospheric entrainment.
[45CSR§7-5.2]

4.1.6. **45CSR10**

The Rotary Wood Dryer and Multi-hearth Retort Furnace shall each comply with all applicable limitations and standards under 45CSR10, including the requirements given below under (a).

- a. No person shall cause, suffer, allow or permit the emission into the open air from any source operation an in-stack sulfur dioxide concentration exceeding 2,000 parts per million by volume from existing source operations, except as provided in subdivisions 4.1.a through 4.1.e.
[45CSR§10-4.1]

- 4.1.7. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions and according to manufacturer's recommendations, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. **Monitoring Requirements**

- 4.2.1. Compliance with Section 3 of 45CSR7 shall be determined by conducting daily visual emission observations in accordance with Method 22 of 40 CFR 60, Appendix A for emission point S-02. These observations shall be conducted during periods of normal facility operation for a sufficient time

interval to determine if the unit has visible emissions using procedures outlined in 40CFR60 Appendix A, Method 22. If sources of visible emissions are identified during the survey, the permittee shall conduct an Opacity Evaluation as outlined in 45CSR7A-2.1.a,b, within 24 hours. A 45CSR7A-2.1.a,b evaluation shall not be required if the visible emission condition is corrected in a timely manner and the units are operated at normal operating conditions with no visible emissions being observed. Records shall be maintained on site reporting the results of each test. An Opacity Evaluation shall only be conducted by an employee or contractor certified in 40CFR60 Appendix A, Method 9. Upon observing any visible emissions during an Opacity Evaluation in excess of twenty percent (20%) opacity (but less than forty percent (40%) opacity) for any period or periods aggregating more than five (5) minutes in any sixty (60) minute period, or upon observing any visible emissions in excess of forty percent (40%) opacity, the Company shall submit a written report, certified by a responsible official, to the Director of the Division of Air Quality within five (5) days after taking said reading. When in compliance on a daily basis for four (4) consecutive weeks, then the observation frequency shall be decreased to a once-a-week sampling schedule. If an exceedance of the opacity limit is measured, then the observation frequency shall be reverted to the once-a-day sampling schedule and begin the progressive monitoring cycle again.

- 4.2.2. The permittee shall maintain accurate records on the amount of wet wood charged to the Rotary Wood Dryer, the amount of dry wood charged to the Multi-hearth Retort Furnace and the amount of wood char produced by the facility. Compliance with hourly maximum limits shall be calculated on the basis of a rolling thirty day average expressed in tons per hour based on the hours of production for any specific 30 day period. Compliance with the annual limits shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of measured parameter, in tons, at any given time for the previous twelve (12) months.

The permittee shall keep accurate records of the date and time to load each truck at the Beryl Facility (production time), the quantity (tons) of char loaded on each truck and the monthly total of char produced. The rate of char production will then be utilized to back calculate the amount of wet and dry wood charged to the process. Said records shall be certified by a responsible official and maintained on site for a period of no less than five (5) years.

4.3. Testing Requirements

- 4.3.1. At such reasonable time(s) as the Secretary may designate, in accordance with the provisions of 3.3 of this permit, the permittee shall conduct or have conducted test(s) to determine compliance with the emission limitations or emission control requirements established in this permit and/or applicable regulations.

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit and time of sampling or measurements;
 - b. The date(s) analyses were performed;
 - c. The company or entity that performed the analyses;
 - d. The analytical techniques or methods used;

- e. The results of the analyses; and
 - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
 - b. Steps taken to minimize emissions during the event.
 - c. The duration of the event.
 - d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹

(please use blue ink)

Responsible Official or Authorized Representative _____

Date _____

Name and Title

(please print or type)

Name _____

Title _____

Telephone No. _____

Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (I) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.



west virginia department of environmental protection

Division of Air Quality
601 57th Street, SE
Charleston, WV 25304
Phone: (304) 926-0475 • Fax: (304) 926-0479

Earl Ray Tomblin, Governor
Randy C. Huffinan, Cabinet Secretary
www.dep.wv.gov

ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-2117E
Plant ID No.:	057-00003
Applicant:	Kingsford Manufacturing Company
Facility Name:	Beryl Plant
Location:	Near Piedmont, Mineral County
SIC/NAICS Code:	2861/325191
Application Type:	Modification
Received Date:	June 24, 2016
Engineer Assigned:	Joe Kessler
Fee Amount:	\$1,000
Date Received:	June 27, 2016
Complete Date:	July 21, 2016
Due Date:	October 9, 2016
Applicant's Ad Date:	June 25, 2016
Newspaper:	<i>News Tribune</i>
UTM's:	666.00 km Easting • 4,371.00 km Northing • Zone 17
Latitude/Longitude:	39.47729/-79.06650
Description:	Modification to increase the char production limits to 5.0 tons per hour (TPH) and 32,000 tons per year (TPY).

Entire Document
NON-CONFIDENTIAL

Kingsford Manufacturing Company's (KMC) Beryl Plant was originally constructed in the 1963 by Westvaco. At some point after construction, KMC took ownership of the facility and began operating. However, KMC leased the land where the facility sits until purchasing the site in 2012.

On June 18, 1997, the facility was issued Permit Number R13-2117 as a result of a Consent Order (CO-R7-97-6). The Consent Order required KMC to remove the existing scrubber system and to install high-efficeint cyclones and an After Combustion Chamber (ACC) to control emissions from both the rotary wood dryer and the retort furnace. Additionally, an annual char production cap of 22,500 TPY was established to ensure the project emissions increases did not exceed "major modification" significant levels given under 45CSR14. The permit does not appear to have covered all equipment and processes at the facility; some remained grandfathered under 45CSR13. Subsequently, the permit was modified as described below:

- On June 21, 1999, Permit Number R13-2117A was issued to KMC to revise the SO₂ limit and to increase the maximum hourly char production rate from 3.5 to 4.5 TPH;
- On June 21, 1999, Permit Number R13-2117B was issued to KMC as an Administrative Update to increase the maximum annual char production rate from 22,500 to 28,000 TPY. This production increase did not increase emissions as the NO_x emission factor was revised downward based on recent stack testing;
- On October 2, 2002, Permit Number R13-2117C was issued to KMC as a Class I Administrative Update to authorize less frequent visible emission checks;
- On December 10, 2002, Permit Number R13-2117D was issued to KMC as a Class I Administrative Update to authorize clarifying changes to the Title V permit; and
- On October 1, 2012, General Permit Number G60-C047 was issued to KMC for the replacement of the facility emergency generator.

DESCRIPTION OF PROCESS/MODIFICATIONS

Existing Facility

Kingsford's Beryl Plant produces "char" from a feedstock of raw bark chips. Bark chips are received via belt conveyer from a neighboring paper mill and stored outside in piles before being screened, sized, and dried in a rotary wood dryer (03-001). The sized and dried feedstock is then charred in an oxygen starved environment (a process known as pyrolyzing) in the multi-hearth retort furnace (03-002). Heat for the furnace is supplied by six (6) 4 mmBtu/hr natural-gas fired retort burners. The produced char is quenched with water and conveyed to trailers for transport to Kingsford's Parsons Plant as the main ingredient in charcoal manufacturing.

The dryer and the furnace air emissions are controlled by cyclone collectors which are exhausted to a common After Combustion Chamber (ACC) for oxidation (C-8). The ACC uses a 40 mmBtu/hr propane-gas fired burner. The hot exhaust gases from the ACC are recirculated and used as the heat source in the wood dryer. Currently the facility is permitted to produce a maximum of 4.5 TPH of wood char and 28,000 TPY of wood char.

Proposed Modifications

Kingsford is now proposing to modify the Beryl Plant by increasing the permitted limit of wood char production to 5.0 TPH and 32,000 TPY. While this may cause de-bottlenecked increases in throughput and emissions plant-wide, no other physical changes are being proposed.

SITE INSPECTION

Due to the nature of the proposed modification, a site inspection by the writer was deemed as not necessary. On February 11, 2014, a site inspection of the Beryl Plant was conducted by Mr.

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Kingsford Manufacturing Company
Beryl Plant

Karl Dettinger of the DAQ Compliance/Enforcement (C/E) Section. This inspection found the facility to be "Status 30 - In Compliance."

AIR EMISSIONS AND CALCULATION METHODOLOGIES

Kingsford included in Attachment N updated post-modification facility-wide emissions calculations for the Beryl Plant. Calculations for the emissions from the ACC were based on stack test data. Emissions from material handling, truck traffic and other equipment/processes at the facility were based emission factors given under AP-42 Section 1.4 (AP-42 is a database of emission factors maintained by USEPA). Variables used in the material handling and truck traffic calculations of these emission factors were based on an estimation of actual plant and material conditions.

Emissions Summary

The new post-modification potential-to-emit (PTE) of the Beryl Plant is given in Table N-1 of Attachment N of the permit application. The change in PTE as a result of the proposed modifications evaluated herein is given in the following table:

Table 1: Change In Facility-Wide Annual PTE

Pollutant	Pre-Modification ⁽¹⁾	Post-Modification	Change
	tons/year	tons/year	tons/year
CO	29.02	32.94	3.92
NO _x	182.16	208.00	25.84
PM _{2.5}	65.53	80.75	15.22
PM ₁₀	98.74	111.86	13.12
PM	166.85	167.63	0.78
SO ₂	42.00	48.00	6.00
VOCs	8.10	9.26	1.16
HAPs	4.50	0.24	-4.26

(1) Emissions taken from R30-05700003-2012 Fact Sheet.

REGULATORY APPLICABILITY

The following will discuss only the regulatory applicability/non-applicability of general rules and specific rules to the emission units that have been proposed to be added or modified as part of this permitting action.

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45CSR6: To Prevent and Control Particulate Air Pollution from Combustion of Refuse (Non-Applicability)

The particulate matter emission standard from 45CSR7 (§45-7-4.1) applies to the emissions of the ACC and is more stringent than those given under 45SR6, Section 4.1. Because of the "inconsistency between rules" provision in 45CSR6 and 7, the more stringent rule will apply and, therefore, the particulate matter standard from 45CSR6 was deemed not applicable.

45CSR7: To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations

45CSR7 has two substantive requirements potentially applicable to the drying and charring process as controlled and emitted from the ACC. These are the opacity requirements under Section 3 and the mass emission standards under Section 4. Each of these sections will be discussed below.

45CSR7 Opacity Standards - Section 3

Section 3.1 sets an opacity limit of 20% on the ACC emission point. As the furnace and dryer both exhaust first through high-efficiency cyclones to remove particulate matter, proper maintenance and use of the propane-fired ACC should mitigate any from opacity issues from the unit.

45CSR7 Weight Emission Standards - Section 4

Section 4.1 of 45CSR7 requires that each manufacturing process source operation or duplicate source operation meet a particulate matter limit based on the weight of material processed through the source operation. As determined by the DAQ during the review of Permit Number R13-2117, the drying and charring process as controlled and emitted from the ACC is defined as a type 'a' source type operation under §45-7-2.38. Further, based on the compliance determination methodology determined during the review of Permit Number R13-2117, the DAQ uses an aggregating method to determine compliance with the weight emission standards under 45CSR7 for the drying and charring process. Each source is considered to generate a separate Section 4 limit based on the process weight rate (PWR) of each source. The particulate matter limit at the ACC stack is then based on summing each individual limit. Section 4.1 compliance is given in the following table:

Table 2: 45CSR7 Section 4.1 Compliance

Source Operation	Source Type	Process Weight Rate (lb/hr)	Table 45-7A Limit (lb/hr)	PTE (lb/hr)	% of Limit	Control Device
Wood Dryer	A	72,000 Wet Wood	31.88	50.00	n/a	ACC
Retort Furnace	A	36,000 Dry Wood	25.60		n/a	ACC
			57.48	50.00	86.99%	

45CSR10: To Prevent and Control Air Pollution from the Emission of Sulfur Oxides

45CSR10 has requirements limiting in-stack SO₂ concentrations of “manufacturing processes.” Previously, the DAQ has regulated drying and charring process “manufacturing processes” subject to section 4.1 of 45CSR10.

Section 4.1 of Rule 10 requires that no in-stack SO₂ concentration exceed 2,000 parts per million by volume (ppm_v) from any manufacturing process source operation. As noted, the drying and charring process is defined as a “manufacturing process.” Based on the estimated maximum revised SO₂ emission rate of the units as emitted from the ACC (48 lb-SO₂/hr) and the stack parameters given in the application (Emission Point Data Summary Sheet), the estimated worst-case in-stack SO₂ concentration was calculated to be 55.91 ppm_v or 2.80% of the limit.

45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation

The proposed changes to the Beryl Plant have the potential to increase the PTE of the facility in excess of six (6) lbs/hour and ten (10) TPY of a regulated pollutant (see Table 1 above) and, therefore, pursuant to §45-13-2.17, the changes are defined as a “modification” under 45CSR13. Pursuant to §45-13-5.1, “[n]o person shall cause, suffer, allow or permit the construction, modification, relocation and operation of any stationary source to be commenced without . . . obtaining a permit to construct.” Therefore, KMC is required to obtain a permit under 45CSR13 for the modification of the facility.

As required under §45-13-8.3 (“Notice Level A”), KMC placed a Class I legal advertisement in a “newspaper of general circulation in the area where the source is . . . located.” The ad ran on June 25, 2016 in the *News Tribune* and the affidavit of publication for this legal advertisement was submitted on July 7, 2016.

45CSR14: Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration (NON-Applicability)

The Beryl Plant is an existing major stationary source located in Mineral County, WV. Mineral County is classified as “in attainment” with all National Ambient Air Quality Standards (NAAQS). Pursuant to 45CSR14, the proposed increase in the annual char production rate is considered, under §45-14-2.40, a “physical change or a *change in the method of operation*.” As the proposed increase in annual char production rate is a relaxation of the synthetic minor limit established under Permit Number R13-2117B issued on June 21, 1999 (which was a modification of the original synthetic minor limit established under R13-2117 on June 18, 1997), it is appropriate to retroactively review the impact of the current requested change based on the PSD applicability analysis done in 1997 for R13-2117. This is based on the language given under §45-14-19.7 that states:

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Kingsford Manufacturing Company
Beryl Plant

[§45-14-19.7]

Any person who owns or operates any particular source or modification which *becomes* a major stationary source or major modification solely by virtue of a relaxation in any limitation, enforceable by the Administrator or the Secretary, on the capacity of the source or modification otherwise to emit a pollutant (such as a restriction on hours of operation), shall become subject to the requirements of this rule as though construction had not yet commenced on the source or modification.

KMC followed this methodology in PSD applicability analysis included under Attachment N of the permit application. As the char production increase may have de-bottlenecking effects upstream and downstream of the dryer/furnace/ACC, the applicability analysis was done on a facility-wide basis. The original baseline actual emissions (BAE = annualized actual emissions from the calendar years 1994/1995) were used again and are based on the configuration of the plant at that time. New potential emissions are based on the proposed post-modification annual char production limit of 32,000 TPY and were based on, as mentioned above, the most recent stack test data at the facility. As the Beryl Plant is a constituent process in charcoal production and also has a SIC code that begins with 28 (based on EPA guidance, all facilities that have SIC codes that begin with 28 are classified as a “Chemical Process Plant”), fugitive emissions were also considered in the applicability analysis.

For a complete discussion of the PSD applicability analysis see Attachment N of the permit application. The following is a summary of the facility-wide BAE-PTE calculation:

Table 2: Summary Facility-Wide BAE-PTE Calculation (TPY)

Pollutant	BAE ⁽¹⁾	PTE	Change	Significant Level ⁽²⁾	PSD?
CO	78.60	32.94	-45.66	100.00	No
NO _x	174.20	208.00	33.80	40.00	No
PM _{2.5}	101.11	80.75	-20.36	10.00	No
PM ₁₀	154.90	111.86	-43.04	15.00	No
PM	161.10	167.63	6.53	25.00	No
SO ₂	11.70	48.00	36.30	40.00	No
VOCs	129.10	9.26	-119.84	40.00	No

(1) Based on the annualized actual emissions from the calendar years 1994/1995.

(2) §45-14-2.74(a)

45CSR30: Requirements for Operating Permits

45CSR30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. The Beryl Plant, defined under Title V as a “major source,” was last issued a Title V renewal permit on December 4, 2012 (R30-05700003-2012). Proposed changes evaluated herein must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

R13-2117E
Kingsford Manufacturing Company
Beryl Plant

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

There is no proposed increase in currently emitted non-criteria regulated pollutants or emissions of new non-criteria regulated pollutants as part of the changes evaluated herein.

AIR QUALITY IMPACT ANALYSIS

The estimated maximum emissions of the modified facility are less than applicability thresholds that would define the proposed changes as a "major modification" under 45CSR14 and, therefore, no air quality impacts modeling analysis was required. Additionally, based on the nature and location of the modified source, an air quality impacts modeling analysis was not required under 45CSR13, Section 7.

MONITORING, COMPLIANCE DEMONSTRATIONS, REPORTING, AND RECORDING OF OPERATIONS

There was no changes to the existing monitoring, compliance demonstration, reporting, and record-keeping requirements (MRR).

PERFORMANCE TESTING OF OPERATIONS

There were no substantive changes to the performance testing requirements made as a result of the changes evaluated herein.

CHANGES TO PERMIT R13-2117D

Draft Permit Number R13-2117E was put into the new NSR boilerplate format and is, therefore, completely different than R13-2117D.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that compliance with all applicable state and federal air quality regulations will be achieved. Therefore, I recommend to the Director the issuance of a Permit Number R13-2117E to Kingsford Manufacturing Company for the proposed modification of the Beryl Plant located near Piedmont, Mineral County, WV.



Joe Kessler, PE
Engineer

9-17-10

Date

R13-2117E
Kingsford Manufacturing Company
Beryl Plant

INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name KINGSFORD MANUFACTURING COMPANY

Permitting Action Number R13-21176 Total Days 87 DAQ Days 60

Permitting Action:

- | | | |
|---|------------------------------------|---|
| <input type="radio"/> Permit Determination | <input type="radio"/> Temporary | <input checked="" type="radio"/> Modification |
| <input type="radio"/> General Permit | <input type="radio"/> Relocation | <input type="radio"/> PSD (Rule 14) |
| <input type="radio"/> Administrative Update | <input type="radio"/> Construction | <input type="radio"/> NNSR (Rule 19) |

Documents Attached:

- | | |
|---|--|
| <input checked="" type="checkbox"/> Engineering Evaluation/Memo | <input checked="" type="checkbox"/> Completed Database Sheet |
| <input checked="" type="checkbox"/> Draft Permit | <input type="checkbox"/> Withdrawal |
| <input checked="" type="checkbox"/> Notice | <input type="checkbox"/> Letter |
| <input type="checkbox"/> Denial | <input type="checkbox"/> Other (specify) _____ |
| <input type="checkbox"/> Final Permit/General Permit Registration | _____ |

Date	From	To	Action Requested
9-19-16	Joe Kessler	Bev McKeone	NOTICE APPROVAL
9/26	Bev	Joe	Go to Notice

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).

Kessler, Joseph R

From: Scott Stephenson <scott.stephenson@clorox.com>
Sent: Tuesday, July 12, 2016 11:20 AM
To: Kessler, Joseph R
Subject: RE: WV DAQ Permit Application Status for Kingsford Manufacturing Company; Beryl

Joe: I'll be out of the office on vacation starting Friday this week through the 27th and just wanted to verify you have everything now for Beryl's permit application. You should have received the Class I Legal Ad Certification last week.

Scott Stephenson
WV Operation Engineering Manager
(304) 478-5529 – O
(304) 940-1425 – M



Entire Document
NON-CONFIDENTIAL

From: Kessler, Joseph R [mailto:Joseph.R.Kessler@wv.gov]
Sent: Thursday, June 30, 2016 2:52 PM
To: Scott Stephenson
Cc: Mike Young; Carey Preston
Subject: RE: WV DAQ Permit Application Status for Kingsford Manufacturing Company; Beryl

Thanks Scott, I will do the required 30 day completeness check prior to 7/24 and let you know if I need anything else.

Joe Kessler

From: Scott Stephenson [mailto:scott.stephenson@clorox.com]
Sent: Monday, June 27, 2016 11:52 AM
To: Kessler, Joseph R <Joseph.R.Kessler@wv.gov>
Cc: Mike Young <Mike.Young@clorox.com>; Carey Preston <carey.preston@clorox.com>
Subject: RE: WV DAQ Permit Application Status for Kingsford Manufacturing Company; Beryl

Joe: Just a quick update on the items below.

- Class I Legal advertisement was run last Saturday (see attached). I'll send the hard copy affidavit as soon as I receive it.
- \$1,000 permit fee was paid this morning via credit card. I saw where Beth Ward sent a confirmation e-mail and copied your office.

Thanks and
Scott Stephenson
WV Operation Engineering Manager
(304) 478-5529 – O
(304) 940-1425 – M



I.D. No. 057-00003 Reg. 2117E
Company KINGSFORD
Facility BEAYL Region _____
Initials JSR

From: Adkins, Sandra K [mailto:Sandra.K.Adkins@wv.gov]
Sent: Monday, June 27, 2016 10:06 AM
To: Carey Preston; Scott Stephenson
Cc: McKeone, Beverly D; Kessler, Joseph R; Ward, Beth A
Subject: WV DAQ Permit Application Status for Kingsford Manufacturing Company; Beryl

**RE: Application Status
Kingsford Manufacturing Company
Beryl
Facility ID No. 057-00003
Application No. R13-2117E**

Mr. Preston,

Your application for a modification permit for the Beryl Plant was received by this Division on June 24, 2016, and was assigned to Joe Kessler. The following items were not included in the initial application submittal:

Original affidavit for Class I legal advertisement not submitted.

Application fee AND/OR additional application fees:

**\$1,000 Construction, Modification, Relocation or Temporary Permit*

(You may contact the Accounts Receivable section at 304 926-0499 ext. 4888 or Beth Ward at ext. 1846 to pay via credit card. DEP accepts Visa and MasterCard only.)

These items are necessary for the assigned permit writer to continue the 30-day completeness review.

Within 30 days, you should receive a letter from Joe stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

Should you have any questions, please contact the assigned engineer, Joe Kessler, at 304-926-0499, extension 1219.

This e-mail (including any attachments) may contain information confidential to The Clorox Company and is intended only for the use of the intended recipient(s). If the reader of this message is not the intended recipient(s), you are notified that you have received this message in error and that any review, dissemination, distribution or copying of this message is strictly prohibited. If you have received this message in error, please delete this message and notify the sender immediately.

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Kessler, Joseph R

From: Scott Stephenson <scott.stephenson@clorox.com>
Sent: Thursday, July 21, 2016 6:06 PM
To: Kessler, Joseph R
Subject: Re: R13-2117E Permit Application Status

Yes, understood. Thanks Joe.

Sent from my iPhone

On Jul 21, 2016, at 1:27 PM, Kessler, Joseph R <Joseph.R.Kessler@wv.gov> wrote:

I understand, however, in the case of the completeness review, that is driven by a statutory time frame.

Joe

From: Scott Stephenson [<mailto:scott.stephenson@clorox.com>]
Sent: Thursday, July 21, 2016 4:24 PM
To: Kessler, Joseph R <Joseph.R.Kessler@wv.gov>
Cc: Carey Preston <carey.preston@clorox.com>
Subject: Re: R13-2117E Permit Application Status

Joe: Thanks for the update on our application for Beryl. Just a reminder, as we spoke last week, we request to have the permit application for our Parsons plant substituted in priority over the Beryl permit. The Parsons permit is needed for construction planned in September.

Thanks,
Scott Stephenson

Sent from my iPhone

On Jul 21, 2016, at 5:48 AM, Kessler, Joseph R <Joseph.R.Kessler@wv.gov> wrote:

RE: Application Status: Complete
Kingsford Manufacturing Company
Beryl Plant
Permit Application: R13-2117E
Plant ID No.: 057-00003

Mr. Stephenson,

Your application for a modification permit was received by the Division of Air Quality (DAQ) on June 24, 2016 and assigned to the writer for review. Upon an initial review, the application has been deemed complete as of the date of this e-mail. The ninety (90) day statutory time frame began on that day.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact me at (304) 926-0499 ext. 1219 or reply to this email.

Thank You,

Joe Kessler, PE
Engineer
West Virginia Division of Air Quality
601-57th St., SE
Charleston, WV 25304
Phone: (304) 926-0499 x1219
Fax: (304) 926-0478
Joseph.r.kessler@wv.gov

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Kessler, Joseph R

From: Kessler, Joseph R
Sent: Friday, September 16, 2016 11:36 AM
To: 'Scott Stephenson'
Subject: RE: Beryl Question

Thanks Scott, and also I found the information in the old files I was looking for. I will let you know if I need any additional info. No need to go around asking at the moment.

Thanks

Joe

From: Scott Stephenson [mailto:scott.stephenson@clorox.com]
Sent: Friday, September 16, 2016 10:58 AM
To: Kessler, Joseph R <Joseph.R.Kessler@wv.gov>
Cc: Scott Stephenson <scott.stephenson@clorox.com>; Mike Young <Mike.Young@clorox.com>
Subject: RE: Beryl Question

Joe: Beryl was built in 1963 by the West-Veco Paper Company. Kingsford has been taking char from the site since day one. Somewhere through the years though (maybe from the beginning), Kingsford took ownership of the equipment. Oddly we have never owned the land but leased it until 2012 when they agreed to sell us the couple acres we had leased for fifty years. Strange relationship! You may want to note that major environmental upgrades were made in 1997.

Scott Stephenson
WV Operation Engineering Manager
(304) 478-5529 – O
(304) 940-1425 – M



From: Kessler, Joseph R [mailto:Joseph.R.Kessler@wv.gov]
Sent: Thursday, September 15, 2016 10:49 AM
To: Scott Stephenson
Subject: Beryl Question

Scott, when was the Beryl Plant originally constructed? I like to give a little history in my fact sheets. And I assume that it was always owned by Kingsford.

Thanks,

Joe Kessler, PE
Engineer
West Virginia Division of Air Quality
601-57th St., SE
Charleston, WV 25304
Phone: (304) 926-0499 x1219
Fax: (304) 926-0478
Joseph.r.kessler@wv.gov

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INSPECTION REPORT

DEPARTMENT OF ENVIRONMENTAL PROTECTION

West Virginia Division of Air Quality

Company:	Black Wolf Mining			Facility:	XMV36 Loadout
Region:	6	Plant ID#:	047-00078	Regulations:	R13-2496B

Inspected By: John Money penny

Title: Engineer

Memo Date: May 7, 2012

Inspection Date: April 24, 2012

On April 24, 2012 the author performed an unannounced inspection of the Black Wolf Mining XMV36 Loadout located in Elbert, McDowell County.

Regulatory Applicability

The loadout is subject to the conditions of R13-2496B which references Rule 5 and also NSPS Subpart Y.

Inspection Findings

The site consists of multiple mine portals. All coal previously stored at this site is now belted underground to the XMV39A loadout (047-00126) on the other side of the mountain. The Company wants to keep this site active in case plans change.

The facility is in compliance, status code 41.

John Money penny
Engineer

Photographs Taken:	No	ITS Updated:	Yes
Visual Emissions Taken:	No	Facility Status Code:	41

Inspection of Black Wolf XMV36
Inspected on April 24, 2012
Page 1

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Kessler, Joseph R

From: Kessler, Joseph R
Sent: Thursday, July 21, 2016 8:48 AM
To: Scott Stephenson; Carey Preston
Cc: Kessler, Joseph R
Subject: R13-2117E Permit Application Status

**RE: Application Status: Complete
Kingsford Manufacturing Company
Beryl Plant
Permit Application: R13-2117E
Plant ID No.: 057-00003**

Mr. Stephenson,

Your application for a modification permit was received by the Division of Air Quality (DAQ) on June 24, 2016 and assigned to the writer for review. Upon an initial review, the application has been deemed complete as of the date of this e-mail. The ninety (90) day statutory time frame began on that day.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact me at (304) 926-0499 ext. 1219 or reply to this email.

Thank You,

Joe Kessler, PE
Engineer
West Virginia Division of Air Quality
601-57th St., SE
Charleston, WV 25304
Phone: (304) 926-0499 x1219
Fax: (304) 926-0478
Joseph.r.kessler@wv.gov

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Kessler, Joseph R

From: Ward, Beth A
Sent: Monday, June 27, 2016 11:24 AM
To: Adkins, Sandra K; carey.preston@clorox.com; scott.stephenson@clorox.com
Cc: McKeone, Beverly D; Kessler, Joseph R
Subject: RE: WV DAQ Permit Application Status for Kingsford Manufacturing Company; Beryl
Attachments: 2016_06_27_11_21_31.pdf

Please see the attached receipt.

Thank You!

OASIS CR 1600141271

From: Adkins, Sandra K
Sent: Monday, June 27, 2016 10:06 AM
To: carey.preston@clorox.com; scott.stephenson@clorox.com
Cc: McKeone, Beverly D <Beverly.D.Mckeone@wv.gov>; Kessler, Joseph R <Joseph.R.Kessler@wv.gov>; Ward, Beth A <Beth.A.Ward@wv.gov>
Subject: WV DAQ Permit Application Status for Kingsford Manufacturing Company; Beryl

**RE: Application Status
Kingsford Manufacturing Company
Beryl
Facility ID No. 057-00003
Application No. R13-2117E**

Mr. Preston,

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Application fee AND/OR additional application fees:

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Should you have any questions, please contact the assigned engineer, Joe Kessler, at 304-926-0499, extension 1219.

UC Defaulted Accounts Search Results

Sorry, no records matching your criteria were found.

FEIN:

Business name: KINGSFORD MANUFACTURING COMPANY

Doing business

as/Trading as:

Please use your browsers back button to try again.

WorkforceWV	Unemployment Compensation	Offices of the Insurance Commissioner
-----------------------------	---	---

UC Defaulted Accounts Search Results

Sorry, no records matching your criteria were found.

FEIN: 943240524

Business name:

Doing business as/Trading as:

Please use your browsers back button to try again.

<u>WorkforceWV</u>	<u>Unemployment Compensation</u>	<u>Offices of the Insurance Commissioner</u>
--------------------	--------------------------------------	--



Mr. Joe Kessler

Division of Air Quality

West Virginia Department of Environmental Protection

60157th Street

Charleston, WV 25304

7015 1520 0000 0531 6141

RE: Air Quality Permit Notice of Application

Sir,

Enclosed please find the following:

1. Air Quality Permit, Notice of Application for the Beryl, WV plant.
2. Notarized Statement of Publication from the News Tribune, Keyser WV.

Let me know if there are any question.

Thank you,

Aaron K. Harris

Environmental Resource

Kingsford Mfg.

WV Operations

AARON.HARRIS@CLOROX.COM

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ID. No. 057-00003 Reg. 21176
Company KMC
Facility Beryl
Initials JH

*Parsons Plant
Highway 219 South
PO Box 464
Parsons, WV
26287*

(304) 478-2911
FAX: (304) 478-2129

I, as an officer of the News-Tribune, a daily newspaper published at Keyser, Mineral County, West Virginia, hereby certify that the _____

Kingsford Manufacturing

in the case of _____

Air Quality Permit
Notice

vs. _____

a copy whereof is hereto annexed has been published for 1 consecutive

time

in said NEWS TRIBUNE, the first publication being on the

25th day of,

JUNE

2016

Given under my hand at

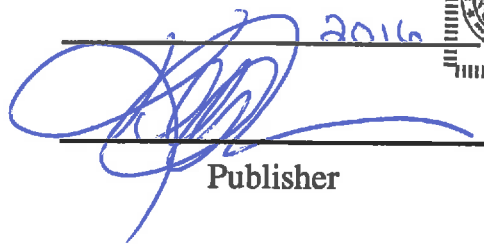
Keyser this 25th

day of JUNE

2016



OFFICIAL SEAL
Notary Public, State Of West Virginia
SANDRA K. CANFIELD
167 Wood Ridge Drive
Keyser, WV 26726
My Commission Expires April 19, 2021



Publisher

Publisher's Fee

\$ 57.50

Sandra K. Canfield
My Commission expires
4-19-21

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Legal Advertisement

AIR QUALITY PERMIT NOTICE Notice of Application

Notice is given that Kingsford Manufacturing Company has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a Modification Permit for an increase in annual char production at the charcoal manufacturing plant located adjacent to WV Route 46 near the WV-Maryland border, slightly west of the town of Luke, MD in Mineral County, WV. The latitude and longitude coordinates are: 39.477295 and -79.066496.

The applicant estimates the potential to discharge the following Regulated Air Pollutants will be:

Pollutant	Emissions (tons/year)
NO _x	208.00
CO	32.94
VOC	9.26
SO _x	48.00
PM ₁₀	167.63
PM _{2.5}	111.86
PM _{2.5}	80.75
Methanol	0.24
Lead	0.009

The production increase is anticipated upon receipt of approval from WVDEP. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours.

Dated the 25 day of June, 2016.

By: Kingsford Manufacturing Company

Carey Preston

Plant Manager

P.O. Box 6

Beryl, WV 21540-0006

Adkins, Sandra K

From: Adkins, Sandra K
Sent: Monday, June 27, 2016 10:06 AM
To: 'carey.preston@clorox.com'; 'scott.stephenson@clorox.com'
Cc: McKeone, Beverly D; Kessler, Joseph R; Ward, Beth A
Subject: WV DAQ Permit Application Status for Kingsford Manufacturing Company; Beryl

**RE: Application Status
Kingsford Manufacturing Company
Beryl
Facility ID No. 057-00003
Application No. R13-2117E**

Entire Document
NON-CONFIDENTIAL

Mr. Preston,

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